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Via ECF

The Honorable Denise L. Cote
United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Request to Extend Time to Answer and Reschedule Initial Conference –
Quantum Technology Innovations, LLC v. Pandora Media, LLC, Case No. 1:24-cv-01102

Dear Judge Cote:

We represent Pandora Media, LLC (“Pandora”) in the above-referenced action. On April 12, 2024, we wrote to inform the Court that Pandora had not yet been served with the Complaint in the action but that Plaintiff Quantum Technology Innovations, LLC (“Plaintiff” or “Quantum Technology”) and Pandora had conferred and agreed as follows: (1) counsel would accept service on behalf of Pandora and (2) the parties would jointly request that Your Honor set the deadline for the answer to the Complaint to June 20, 2024 and adjourn and reschedule the initial pretrial conference. D.I. 8. Your Honor granted the request and adjourned the initial pretrial conference to June 26, 2024. D.I. 11.

Since that time, Plaintiff and Pandora have been engaged in discussions for potential early resolution of this action and related actions in the Eastern District of Texas. In order to further facilitate those discussions and minimize unnecessary work, the parties have conferred and jointly request that (1) the deadline for Pandora’s response to the Complaint be extended from June 20, 2024 to July 9, 2024 and (2) the initial pretrial conference currently set for June 26, 2024 (D.I. 11) be adjourned and rescheduled for such a date that is convenient for the Court and after the response to the Complaint has been filed.

This is the parties’ second request for an extension of time in this action and the proposed dates will not impact any other deadlines as none have currently been set.

Respectfully submitted,

Mark A. Baghdassarian

cc: All counsel of record (via ECF)